

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:  BDC GROUP, INC.,  Debtor.	Case No. 23-00484  <b>MOTION TO VACATE</b>
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COMES NOW Creditor Keystone Savings Bank (the “Bank”), and respectfully moves the Court to enter an Order vacating the order entered at Dkt. 513, which granted the Bank and Trustee’s joint motion to approve settlement and for derivative standing, Dkt. 501. The docketing of the joint motion included a bar date served via CM/ECF, but was not served via the bankruptcy noticing center. Because of this issue the Bank requests that the Court vacate its prior order so that notice pursuant to Rule 2002(a)(1) can be given. Upon expiration of the new notice period, and assuming no objections are made, the Bank will submit a proposed order.

WHEREFORE, the movant respectfully request that this Court vacate the order at Dkt. 513 and for such other relief as may be just and proper under the circumstances.

Dated: August 5, 2024

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 5, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Abram V. Carls